

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

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BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 17-CV-3058  
(SRN)

LINDSEY MIDDLECAMP,

Defendants.

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BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 18-CV-466  
(SRN)

GRACE MILLER,  
CATHERINE SCHAEFER,

Defendants.

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BROCK FREDIN,

Plaintiff,

--against--

District Court Case No. 20-CV-01929  
(SRN)

JAMIE KREIL,

Defendant.

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**DECLARATION OF BROCK FREDIN**

STATE OF WISCONSIN                    }  
  ss:  
COUNTY OF SAINT CROIX            }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceeding. I submit this declaration in support of my motion to disqualify Robins Kaplan filed on January 14, 2022. For the reasons stated herein and within the memorandum of law in support of disqualification, I respectfully seek to disqualify and sanction Robins Kaplan including Anne Lockner, J. Haynes Hansen, Philip Sieff, and Charlie Gokey.

**AUTHENTICATION OF DOCUMENTS**

2. Attached hereto as **Exhibit A** is a true and correct copy of emails between Robins Kaplan partner Philip Sieff and Brock Fredin dated August 17, 2021.

3. Attached hereto as **Exhibit B** is a true and correct copy of emails between Robins Kaplan then associate Adam Kohnstamm and Brock Fredin dated August 1, 2017.

**PLAINTIFF BROCK FREDIN'S JANUARY 14, 2022**  
**DISQUALIFICATION DECLARATION**

4. In 2017, I obtained attorney-client privilege with Robins Kaplan partner Philip Sieff.

5. In 2017, I discussed the case captioned *Fredin v. Middlecamp*, Case No. 17-CV-3058 ("*Fredin v. Middlecamp*") with Mr. Sieff.

6. Between June and August 2017, I discussed *Fredin v. Middlecamp* in-person with Mr. Sieff at a weekly religious venue located in Minneapolis.

7. On August 17, 2017, I discussed *Fredin v. Middlecamp* over email with Mr. Sieff.  
(See Ex. A.)

8. On August 1, 2017, I discussed these cases with Robins Kaplan associates Adam M. Kohnstamm and Sarah E. Friedrichs over email. (*See Ex. B.*)

9. In that email, I sent a Microsoft Word version of the *Fredin v. Middlecamp* Complaint and a motion to dismiss involving *Middlecamp v. Fredin*, Case No. 62-HR-CV-17-233, Ramsey County District Court to Mr. Sieff.

10. Additionally, I believe that I discussed similar allegations involving Defendant Miller and Schaefer with Mr. Sieff.

11. Between June and July 2017, at the times where I discussed these cases with Mr. Sieff in-person, I witnessed numerous other lawyers regularly present in the same room.

12. In that room, I regularly recall attorneys Edwin Chanin, Caitlinrose H. Fisher, and Steven Nyberg present.

13. In that room, at the close of at least one if not more weekly events, I do vaguely recall Mr. Chanin, Mr. Sieff, and I discussing *Middlecamp v. Fredin*.

Dated: January 14, 2022  
Saint Croix County, WI



s/ Brock Fredin

Brock Fredin  
Saint Croix County, WI 54002  
(612) 424-5512 (tel.)  
brockfredinlegal@icloud.com  
*Plaintiff, Pro Se*

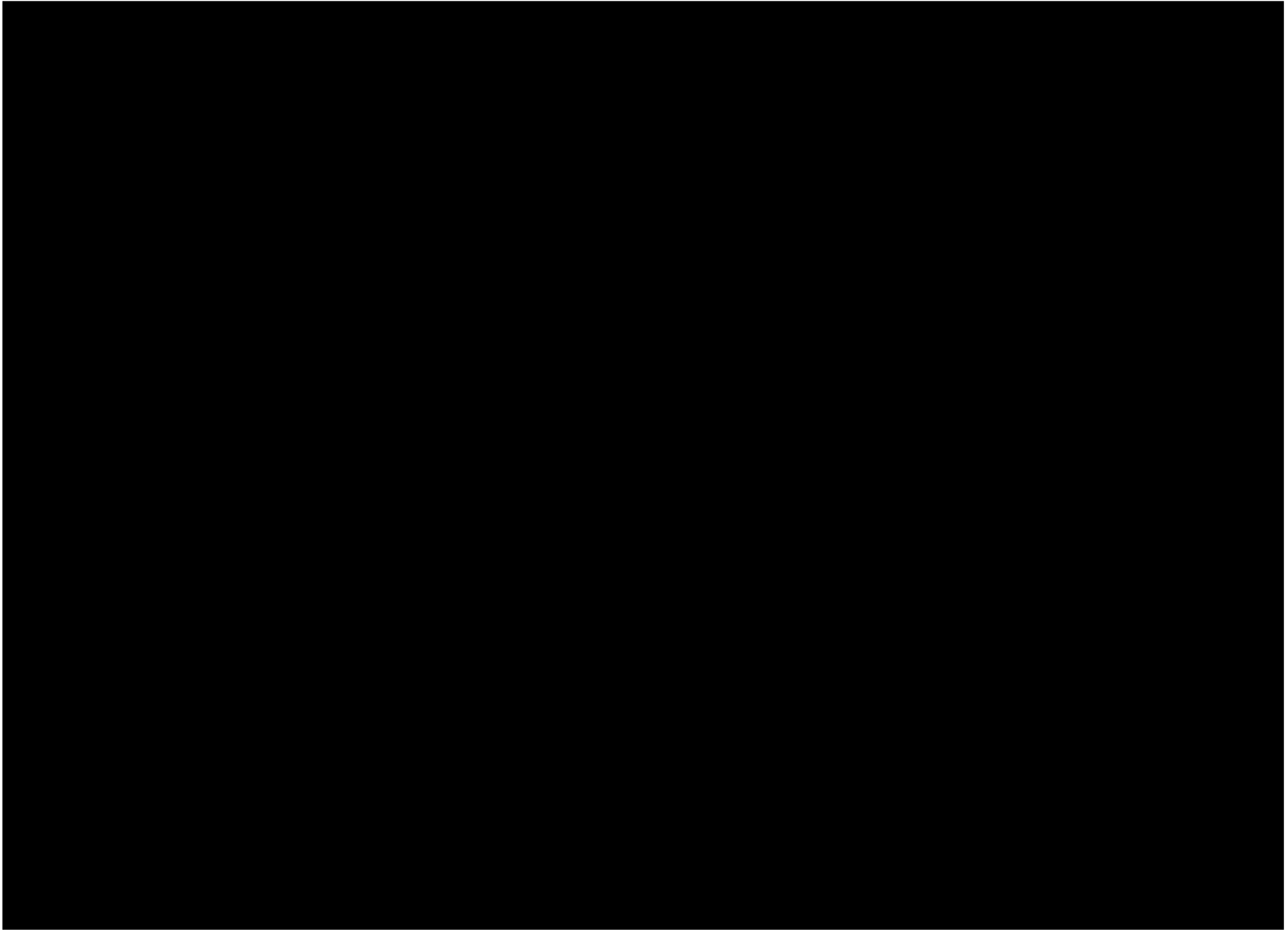
**A**



Brock F <brockf12@gmail.com>

**Brock F** <brockf12@gmail.com>  
To: psieff@robinskaplan.com

Thu, Aug 17, 2017 at 12:52 AM



 **Fredin Memorandum of Law.docx**  
36K

 **FREDIN.COMPLAINT (3).docx**  
387K



Brock F &lt;brockf12@gmail.com&gt;

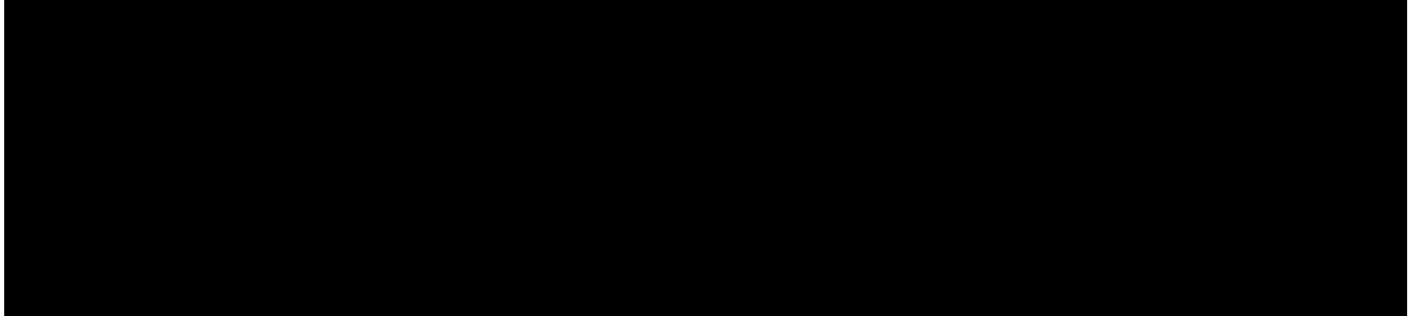
[REDACTED]

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**Sieff, Philip L.** <PSieff@robinskaplan.com>  
To: Brock F <brockf12@gmail.com>

Thu, Aug 17, 2017 at 10:47 AM

Brock



Phil

Philip Sieff - Partner

**Robins Kaplan LLP**

800 LaSalle Avenue | 2800 LaSalle Plaza | Minneapolis, MN 55402

Direct 612.349.0106 | Fax 612.339.4181 | [PSieff@robinskaplan.com](mailto:PSieff@robinskaplan.com) | RobinsKaplan.comBio: [Click Link](#)

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Thank you in advance for your cooperation.

Robins Kaplan LLP  
<http://www.robinskaplan.com>

---

**B**



Brock F &lt;brockf12@gmail.com&gt;

[REDACTED]

---

**Kohnstamm, Adam M.** <AKohnstamm@robinskaplan.com>  
To: Brock F <brockf12@gmail.com>  
Cc: "Friedricks, Sarah E." <SFriedricks@robinskaplan.com>

Tue, Aug 1, 2017 at 3:02 PM

Mr. Fredin,

[REDACTED]

Adam Kohnstamm

[Quoted text hidden]

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[REDACTED]